National Aeronautics and Space Administration (NASA)

Fiscal Year (FY) 2012 Report on
Reviewing and Reducing
Personally Identifiable Information (PII)
And
Eliminating Unnecessary Use of
Social Security Numbers (SSNs)

October 10, 2012

NASA FY 2012 PII Review and Reduction Report to the Office of Management and Budget

Overview

This report provides the results of the National Aeronautics and Space Administration (NASA) annual review of Personally Identifiable Information (PII) holdings in an effort to eliminate the unnecessary collection and use of PII, including Social Security Numbers (SSNs), as required by *OMB Memorandum M-07-16*, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*.[1]

In response to the OMB memorandum, over the past several years NASA developed, updated, and revised the review and reduce plan that provides for the ongoing identification, review, and reduction of NASA holdings of PII to ensure only the minimum PII holdings needed for NASA operations and administration are retained. This plan also includes NASA's efforts for eliminating the unnecessary use of SSNs within systems and programs to identify instances of collection or usage which are not necessary and can be eliminated. Handbooks were developed to ensure that consistent review and reduction activities are conducted at all NASA Centers.

Since PII holdings can be stored electronically, and/or non-electronically, NASA's annual review and reduction activities are conducted to maximize the discovery of redundancies and questionable holdings, and determine applicable methods of reducing holdings. Possible methods of reduction included elimination, consolidation, suppressing visibility, and encryption. The purpose of the annual review is to:

- Reduce PII holdings to a minimum, while allowing NASA to function efficiently;
- Eliminate the use of SSNs in instances where collecting and maintaining SSNs is not essential for the performance of Agency functions; and
- Establish a control process to ensure PII gathering initiatives are properly reviewed for functional requirements and that obligatory PII holdings are reviewed for appropriateness, accuracy and compliance with current policies and procedures.

This report is based on NASA's Fiscal Year (FY) 2012 Privacy Review Action item and includes the Agency's efforts to eliminate the unnecessary use of SSNs.

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[1] Per Office of Management and Budget (OMB) Memorandum M-07-16, NASA is required to develop a schedule by which the Agency will periodically review PII holdings. The schedule is documented in the Information Technology Security (ITS) Plan 1382-01 (*ITS-Plan-1382-1*), *NASA Plan for Reviewing and Reducing PII and Eliminating Unnecessary Use of SSNs* and ITS Handbook (HBK) 1382.03-02 (*ITS-HBK-1382.03-02*), *Privacy Risk Management and Compliance: Annual Reporting Procedures for Reviewing and Reducing PII and Eliminating Unnecessary Use of SSNs*.

Current Initiatives

Review of Current PII Holdings

NASA continues to be vigilant towards reducing the collection and usage of PII throughout the Agency. In FY12 the Center Privacy Managers (CPMs) at each NASA Center tasked owners of information collections with reviewing PII holdings. Specifically, CPMs:

- Review and validate PII holdings identified in the NASA Master Privacy Information Inventory (MPII), identifying information systems containing PII that have been decommissioned and discover any PII holdings newly added to the list.
- Look at possible areas where paper forms of PII can be eliminated and/or replaced by electronic methods, affording more secure means of protection and improve accountability for PII holdings.

In addition, CPMs continue to be regularly involved in the planning phase of new applications and information systems that collect PII.

Privacy & Controlled Unclassified Information (CUI) Assessment Tool (PCAT)

NASA started an initiative in FY12 to more fully automate the PII review process through the development and implementation of PCAT. PCAT improves statutory, regulatory, and policy compliance by providing simple methods to identify privacy information collection requirements and restrictions. Further, PCAT streamlines the communications process and paperwork requirements associated with the analysis of PII collected within non-electronic records, applications, websites, and information systems thereby improving NASA's efficiency in identifying, evaluating, and approving the collection of the PII.

PCAT was designed specifically to ensure that NASA does not unnecessarily collect PII, including SSNs, on a continuous basis including key stakeholder reminders. Ultimately, when fully implemented, PCAT will provide the automated mechanism for conducting annual review and reduce assessment across NASA.

Two examples of PCAT's review and reduce analysis are outlined below.

Figure 1: PCAT Privacy Module Review Analysis

Figure 2: PCAT SSN and Reduce Analysis

Eliminating Unnecessary Use of SSN

NASA's objective is to maximize the protection of SSNs when their use is required and fully justified and eliminate the use of SSNs when not required. For the FY12 Privacy Review Action, CPMs validated the need for use of SSNs with Information System Owners (ISOs), ensuring that use of SSNs was either required by statute, external requirement, or for established business needs. As a result of this annual review, the following activities were accomplished:

- CPMs provided a status review of their Center's forms to identify forms that use SSNs. They validated with the form owners the need for continued use or elimination of SSN field(s) on all forms.
- Working with Center Forms Managers, each CPM followed their plan for identifying existing and new forms that use SSNs. In FY12, CPMs continued to work with forms management personnel to ensure its execution and monitor the development of new forms.

Review and Reduction of PII Holdings Consolidated Results

The FY12 annual review and reduction of PII holdings identified 396 collections of PII (this includes electronic and non-electronic holdings), with justification to retain all of the 396 collections. In addition, there were 55 systems that were decommissioned in FY12 and 10 additional systems that are slated to be decommissioned or consolidated in FY13.

The following table provides a consolidated overview of the results of the FY12 annual review and reduction of PII holdings and elimination of unnecessary SSN usage:

Number of Reported Collections Containing PII	Number of Reported Collections Where PII is Justified	Systems Containing PII Decommissioned in FY12	Systems Containing PII Consolidated in FY12	Collections[2] where SSN use is being Replaced or Eliminated in FY13 or FY14	Systems Scheduled to be Decommissioned or Consolidated in FY13
396	396	55	3	2	10

Table 1: Results of the FY11 PII Review and Reduction of PII Holdings Analysis

Privacy Training and Awareness Initiatives

The following privacy awareness and training initiatives were conducted during FY12:
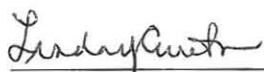
- The NASA Privacy Program Manager continues holding monthly video teleconference meetings with CPMs to provide an enriched ongoing learning and collaborative environment enhanced with invited speakers, interactive presentations, training, issue reviews, and resolution sharing.
- Additional enhancements to NASA's Privacy Program include furthering the collaborative environment through the use of SharePoint. SharePoint allows for additional communications and document sharing, conversation threads and other tools, all of which promote shared lessons learned, queries, postings, and solution developments in a manner that affords overall Privacy community benefits and program improvement.

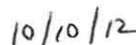[2] A non-electronic form collection, or a collection in a system.

Summary

NASA has already taken a very large step forward in its efforts to review and reduce its PII holdings and to eliminate the unnecessary use of SSNs. NASA continues to work diligently toward developing and implementing various policies, procedures, tools, and data identification methods to help ensure the protection of all forms of PII across the Agency. Updates to privacy documents and techniques are moving forward faster than ever thanks to consistent improvements in communication amongst the CPMs. Sharing of best practices derived from each Center allows the most efficient and effective procedures to be put into place. The CPMs continued engagement with Center and Agency level initiatives displays their commitment towards the protection of PII and the elimination of the unnecessary use of SSNs. NASA's objective is to reduce the risk to the Agency as a whole, as well as NASA personnel and the members of the public who entrust NASA with their information.

Approval

10/10/12

Linda Y. Cureton   Date
Chief Information Officer and
Senior Agency Official for Privacy